Case: 4:25-cr-00034-MTS-SRW Doc. #: 2 Filed: 02/05/25 Page: 1 of 4 PageID #:

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FEB 0, 5 2025

U. S. DISTRICT COURT EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,	)
Plaintiff,	) )
vs.	) No.
BRANDON JONES,	3 4:25-CR-034 MTS/SRW
Defendant.	)

# **INDICTMENT**

# **COUNT ONE**

The Grand Jury charges that:

On or about September 25, 2024, in the City of St. Louis, within the Eastern District of Missouri,

### **BRANDON JONES**,

the defendant herein, did knowingly and intentionally distribute a controlled substance; to wit, methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of mixture or substance containing a detectable amount of methamphetamine involved in the offense and directly attributable to the Defendant is 50 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(viii).

### **COUNT TWO**

The Grand Jury further charges that:

On or about October 8, 2024, in the City of St. Louis, within the Eastern District of Missouri,

# **BRANDON JONES,**

the defendant herein, did knowingly and intentionally distribute a controlled substance; to wit, methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of mixture or substance containing a detectable amount of methamphetamine involved in the offense and directly attributable to the Defendant is 50 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(viii).

# **COUNT THREE**

The Grand Jury further charges that:

On or about August 2, 2024, in the City of Louis, within the Eastern District of Missouri,

# **BRANDON JONES,**

the defendant herein, did knowingly and intentionally possess with the intent to distribute mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethy)-4-piperdinyl] propenamide, also known as fentanyl, a Schedule II controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

#### **COUNT FOUR**

The Grand Jury further charges that:

On or about November 13, 2024, in the City of St. Louis, within the Eastern District of Missouri.

#### **BRANDON JONES**,

the defendant herein, did knowingly and intentionally distribute a controlled substance; to wit, methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

Case: 4:25-cr-00034-MTS-SRW Doc. #: 2 Filed: 02/05/25 Page: 3 of 4 PageID #:

### **COUNT FIVE**

The Grand Jury further charges that:

On or about August 23, 2024, in the City of St. Louis, within the Eastern District of Missouri,

#### **BRANDON JONES,**

the defendant herein, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms.

In violation of Title 18, United States Code, Section 922(a)(1)(A).

# **FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

- 1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts One through Four, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.
- 2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such violation(s).
- 3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922 as set forth in Count Five, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation.
  - 4. If any of the property described above, as a result of any act or omission

Case: 4:25-cr-00034-MTS-SRW Doc. #: 2 Filed: 02/05/25 Page: 4 of 4 PageID #:

of the defendant:

Assistant United States Attorney

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

	A TRUE BILL	
SAYLER A. FLEMING United States Attorney	FOREPERSON	
NAUMAN WADALAWALA, #65252MO		